

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re:

CITY OF DETROIT, MICHIGAN,

Debtor.

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:  
: Chapter 9  
:  
: Case No. 13-53846  
:  
: Hon. Steven W. Rhodes  
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**NATIONAL PUBLIC FINANCE GUARANTEE  
CORPORATION’S FIRST AMENDED FACT WITNESS LIST  
RELATED TO THE PROPOSED PLAN OF ADJUSTMENT**

Pursuant to the Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment [Docket No. 5259] (the “Scheduling Order”), National Public Finance Guarantee Corporation (“National”), by and through its undersigned counsel, hereby identifies the following witnesses and subjects that each witness will address.

1. National identifies the following individuals, exclusive of those to be offered for rebuttal purposes, as fact witnesses that it may call at the confirmation hearing (the “Confirmation Hearing”) on the proposed plan for the adjustment of the City’s debts (the “Plan”).

| NO. | NAME/TITLE   | TESTIMONY TOPICS   |
|-----|--|--|
| 1.  | Adam T. Bergonzi, Managing Director & Chief Risk Officer<br>National Public Finance Guarantee Corporation  | <ul style="list-style-type: none"> <li>• National's insurance policies with respect to the DWSD Bonds.</li> <li>• The Plan's treatment of the DWSD Bonds.</li> <li>• The Plan's impact on National.</li> </ul> |
| 2.  | James Doak<br>Miller Buckfire & Co., LLC   | <ul style="list-style-type: none"> <li>• The Plan's treatment of the DWSD Bonds; the City's Interest Rate Reset Chart; the pro forma credit profile of the DWSD.</li> </ul>                                    |
| 3.  | Thomas J. Gavin<br>Robert W. Baird & Co.   | <ul style="list-style-type: none"> <li>• The Plan's treatment of the DWSD Bonds; the City's Interest Rate Reset Chart; the pro forma credit profile of the DWSD.</li> </ul>                                    |
| 4.  | All "capital market participants," as described in the City's Fourth Amended Disclosure Statement [Docket No. 4391 at 63], who had discussions with the City about the DWSD. | <ul style="list-style-type: none"> <li>• The Plan's treatment of the DWSD Bonds; the City's Interest Rate Reset Chart; the pro forma credit profile of the DWSD.</li> </ul>                                    |
| 5.  | A corporate representative of the City pursuant to Fed. R. Civ. P. 30(b)(6).   | <ul style="list-style-type: none"> <li>• Topics and matters identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].</li> </ul>  |
| 6.  | Any fact witnesses identified by the City and parties objecting to the Plan.   | <ul style="list-style-type: none"> <li>• Topics and matters identified in the Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453].</li> </ul>  |
| 7.  | Any custodian of records necessary to authenticate   | <ul style="list-style-type: none"> <li>• Topics and matters identified in the Notice of Deposition</li> </ul>  |

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|  | documents. | pursuant to Fed. R. Civ. P. 30(b)(6) [Docket No. 4453]. |
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2. National reserves the right to amend its list of fact witnesses, or supplement the testimony topics associated with each witness referenced above, as may be necessary to address any amendments to the Plan.

3. As discovery is still being conducted in this matter, National reserves the right to amend this list of fact witnesses, or supplement the topics associated with each witness referenced above that come to the attention of National as prompted by evidence presented at or before the Confirmation hearing. National further reserves the right to amend this disclosure based on any rulings from the Court at the pre-trial conference or otherwise.

Dated: June 20, 2014

Respectfully submitted,

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